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THE THURMONT BANK
Thurmont, Maryland 21788

Respondents

BILL OF COMPLAINT TO QUIET TITLE, FOR INJUNCTIVE RELIEF AND DECLARATORY JUDGMENT

The Bill of Complaint of H. Lloyd Hoke and Clara May Hoke, his wife, by Richard E. Zimmerman, David E. Aldridge, and Zimmerman and Aldridge, their Solicitors, respectfully represent unto this Honorable Court:

FIRST: That the Complainants, H. Lloyd Hoke and Clara May Hoke, his wife, are and have been possessed of a tract of land in the Thurmont District, Frederick County, State of Maryland, containing 5.16 acres more or less and being the same land and premises described in a Deed from Bessie V. Firor, Widow, to Complainants, H. Lloyd Hoke and Clara May Hoke, his wife, dated November 6, 1968, and recorded among the Land Records of Frederick County, Maryland, in Liber 793, folio 625.

SECOND: That the said 5.16 acre tract of land is separated from the nearest public road of Frederick County; namely, Pryor Road, by various tracts and parcels of land, one of which is all that lot or parcel of land conveyed unto the Respondents herein, Ray A. Downs and Audrey D. Downs, his wife, by Glenn E. Warneking and Dorothy H. Warneking, his wife, by deed dated the 17th day of August, 1971, and recorded among the Land Records of Frederick County, Maryland, in Liber 855, folio 472; that the property is subject to two mortgages to the Thurmont Bank, duly recorded among the Land Records of Frederick County, Maryland.